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12 Software, Inc.

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

THE FACEBOOK, INC.,

Plaintiffs,

v.

CONNECTU LLC, (now known as CONNECTU
INC.) PACIFIC NORTHWEST SOFTWARE,
WINSTON WILLIAMS, AND DOES 1-25,

Defendants.

CASE NO. 5:07-CV-01389-RS

**DEFENDANTS' PACIFIC
NORTHWEST SOFTWARE AND
WINSTON WILLIAMS
ADMINISTRATIVE MOTION TO
FILE DOCUMENTS UNDER SEAL;
DECLARATION OF SCOTT R.
MOSKO; [PROPOSED] ORDER**

Date: May 16, 2007
Time: 9:30 a.m.
Courtroom: 4
Mag. Judge: Hon. Richard Seeborg

ADMINISTRATIVE MOTION FOR FILING UNDER SEAL

Pursuant to Civil Local Rules 7-11 and 79-5(c), Defendants respectfully request leave of Court to file under seal the following documents:

- DEFENDANTS' PACIFIC NORTHWEST SOFTWARE AND WINSTON WILLIAMS OPPOSITION TO FACEBOOK, INC.'S MOTION FOR EXPEDITED DISCOVERY RE: PERSONAL JURISDICTION (HIGHLIGHTED VERSION FOR FILING UNDER SEAL)
- EXHIBITS D AND E TO THE DECLARATION OF SCOTT R. MOSKO IN SUPPORT OF DEFENDANTS' PACIFIC NORTHWEST SOFTWARE AND WINSTON WILLIAMS OPPOSITION TO FACEBOOK, INC.'S MOTION FOR EXPEDITED DISCOVERY RE: PERSONAL JURISDICTION (FILED UNDER SEAL IN THEIR ENTIRETIES)

Each of the above-listed documents contain information that has been designated “Confidential” under the protective order, Defendants are filing this motion as required by Civ. L.R. 79-5(d). As required by Civil Local Rule 79-5(c), Defendants are lodging with the Clerk copies of these documents which the confidential information has been highlighted (for filing under seal) and redacted (for public filing).

SUPPORTING DECLARATION OF SCOTT R. MOSKO

I, Scott R. Mosko, declare as follows:

1. I am an attorney admitted to practice in the State of California and the United States District Court for the Northern District of California, and a partner of Finnegan, Henderson, Farabow, Garrett & Dunner, L.L.P., attorneys of record for Defendants Pacific Northwest Software and Winston Williams. The matters referred to in this declaration are based on my personal knowledge and if called as a witness I could, and would, testify competently to those matters.

2. The representations made above in this Administrative Motion are true and correct to the best of my knowledge and belief.

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct and that this declaration was executed on April 25, 2007, in Palo Alto,
3 California.

4 By: _____ /s/
5 Scott R. Mosko
6

7 **[PROPOSED] ORDER**

8 Upon good cause shown, **IT IS HEREBY ORDERED** that the following documents shall be
9 received and filed under seal in their entireties by the Clerk:

10 1. Exhibits D and E to the Declaration of Scott R. Mosko in Support of Defendants'
11 Opposition to Plaintiffs' Motion Facebook, Inc.'s Motion for Expedited Discovery Re:
12 Personal Jurisdiction.

13 **IT IS FURTHER ORDERED** that the highlighted version of the following document be filed
14 under seal by the Clerk:

15 2. Defendants Opposition to Plaintiffs' Motion Facebook, Inc.'s Motion for Expedited
16 Discovery Re: Personal Jurisdiction.

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19 Dated: _____, 2007

20 _____
21 Honorable Richard Seeborg
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